

Konrad L. Trope, Esq. SBN 133214  
**Novo Law Group, P.C.**  
 4631 Teller Avenue, Suite 140  
 Newport Beach, California 92660  
 (949) 222-0899 (tel)  
 (949) 222-0983 (fax)

Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**PLAINTIFF'S REQUEST TO  
 CONTINUE DATE FOR FILING  
 MOTION FOR DEFAULT JUDGMENT  
 AGAINST WILLIAM TRAVIS  
 SULLIVAN AND SIMPLE  
 COMMUNICATIONS ; ORDER THEREON**

Complaint Filed: August 9, 2007  
 Discovery Cut-Off: N/A  
 Trial: N/A  
 Status Conference: February 8, 2008

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR  
 ATTORNEYS OF RECORD HEREIN:**

Plaintiff Pacific Information Resources, Inc. ("Plaintiff" or "Pacific") hereby requests a  
 continuance of the Court to *complete filing* its Default Judgment Application on February 28,  
 2008 instead of on February 27, 2008. Plaintiff makes this request on the basis of good cause:

1. Plaintiff's Counsel has already filed and caused to be delivered to Judge's  
 Chambers the following documents:

1  
**Request to Continue Date for Filing Motion for Default Judgment**

**Case No. CV-07-4131**

pacific information resources\pleadings\sullivan and simple communications\req to cont date for def judg final as filed 02 28 08

- a. Plaintiff's Notice of Application and Application for Default Judgment;
- b. Plaintiff's Request for Judicial Notice;
- c. Declaration of Tim Koster, President of Plaintiff Pacific;
- d. Expert Declaration of Prof. Ran Hadas;
- e. Expert Declaration of Hayden Bond;
- f. [Proposed] Order—*this was "lodged", not filed.*

Plaintiff's counsel ***will complete by today*** filing and forwarding by messenger to chambers the following documents:

- a. Plaintiff's Memorandum of P's & A's;
- b. Declaration of Konrad Trope.

2. Pulling together all of the documents and voluminous data necessary to support the Default Judgement has *required far more time than ever anticipated. Plaintiff's counsel is being extra careful as the Application seeks damages in excess of \$19 million!*

3. ***Counsel for Plaintiff has spent considerable time being certain that the analysis is solid and will sustain any review by the Court.***

Plaintiff's counsel humbly apologizes to the Court and begs the Court's indulgence *this one last time*. Plaintiff's counsel has three Motions for Summary Judgment to file with this Honorable Court on March 21, 2008 in a related case. Thus, Plaintiff's counsel is thus quite desirous and confident of completing this default application, in particular, the last two remaining pleadings, later today.

1 There will be no prejudice to any party who has direct or related interest in this case,  
2 including those parties who are Defendants in the related case noted herein.

3 Respectfully submitted,

4 DATED: February 28, 2008

**NOVO LAW GROUP, P.C.**

5 BY: /s/Konrad L. Trope, Esq.  
6 California State Bar No. 133214  
7 Novo Law Group, P.C.  
8 4631 Teller Avenue, Ste 140  
9 Newport Beach, California 92660  
10 Telephone: (949) 222-0899  
11 Facsimile: (949) 222-0983  
12 E-mail: ktrope@novolaw.com  
13 Attorneys for Plaintiff PACIFIC  
14 INFORMATION RESOURCES,  
15 INC.

16 ~~PROPOSED~~ ORDER

17 Plaintiff Pacific Information Resources has hereby requested continuance to file its  
18 Defaults Judgment Application against Defendants William Travis Sullivan and Simple  
19 Communications to February 28 \_\_\_\_, 2008.

20 Having considered the requested extension, good cause appearing, therefore, and no  
21 prejudice any parties appearing, IT IS HEREBY ORDERED that:

22 Plaintiff shall file its Application for Default Judgment not later than February 28, 2008

23 Dated: February 29, 2008

24   
25 Honorable MAXINE M. CHESNEY  
26 United States District Judge